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March 23, 2021

VIA ECF

Hon. Gary R. Brown
Hon. Anne Y. Shields
Eastern District of New York
Alfonse M. D'Amato Federal Building
100 Federal Plaza
Central Islip, NY 11722

Re: *In re: Nassau County Water District Cases*,
2:19-cv-04608; *Town of Riverhead v. The 3M Co.*,
et al., 2:21-cv-01034

Dear Judges Brown and Shields:

We are counsel to defendant 3M Company in the above-referenced actions and write on behalf of all parties regarding the *Town of Riverhead* (2:21-cv-01034) action. Plaintiff initiated that action after the parties' conference before Judge Brown on February 24, 2021 during which the three more-recently filed cases were referred to the "Threshold Discovery" being managed by Judge Shields. Service in the *Town of Riverhead* action has recently been completed.

The parties have agreed to submit *Town of Riverhead* to the "Threshold Discovery" process that is scheduled to be completed in the other *In re: Nassau County Water District Cases* on May 21, 2021. *See* Dkt. No. 87 and March 10, 2021 text order. Subject to a reservation of all rights and defenses, Defendants will be filing answers to complaint.

The parties have agreed on the below interim deadlines for Threshold Discovery in *Town of Riverhead*, which we respectfully submit for the Court's endorsement. That discovery will be completed by the same May 21, 2021 deadline applicable in the other cases. The parties have further agreed to apply the same stipulations reflected in the Stipulation and Order Regarding Threshold Discovery (Dkt. No. 87) to this action.

**PROPOSED SCHEDULE FOR THRESHOLD DISCOVERY FOR
*TOWN OF RIVERHEAD***

- The deadline for Defendants to propound any written interrogatories and document demands concerning Threshold Discovery to Plaintiff in the *Town of Riverhead* is March 26, 2021;

Hon. Gary R. Brown
Hon. Anne Y. Shields
March 23, 2021
Page 2

- The deadline for Plaintiff in the Town of Riverhead to respond to the propounded Threshold Discovery is April 26, 2021;
- The parties shall meet and confer on any disputes related to Plaintiff's responses to the Threshold Discovery propounded in the Town of Riverhead and promptly submit any unresolved disputes pursuant to the Magistrate Judge's individual rules;
- The deadline for the parties to complete the production of documents for Threshold Discovery is May 17, 2021 in the Town of Riverhead; and
- The deadline for the parties to conduct potential Threshold Discovery depositions not in dispute in all cases is May 21, 2021.

The parties are available to answer any questions the Court may have and thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Andrew J. Calica

Andrew J. Calica

Counsel for Defendant 3M Company

cc: All counsel of record (by ECF)